INSTRUCTIONS AND FORMS

FOR

COMPARABILITY REPORTING

UNDER TITLE I OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED BY THE NO CHILD LEFT BEHIND ACT OF 2001

P.L. 107-110



TENNESSEE DEPARTMENT OF EDUCATION Nashville, Tennessee

GENERAL INFORMATION

The LEA shall determine annually if comparability requirements have been met and the electronic report submitted to the state for review no later than *November* I^{st} .

If adjustments are needed, they shall be made by $December 1^{st}$ of the same school year. Extensions must be requested in writing and may be granted in certain circumstances.

A local education agency (LEA) operating a program under Title I, ESEA, as amended by NCLB, is required to annually determine that state and locally funded services are being provided on a comparable basis.

Section 1120A(c), Public law 107-110 requires comparability of state and local services be demonstrated under the following conditions:

- 1. Districtwide or for each grade span in which there are both Title I and non-Title I schools.
- 2. If all areas or schools within the district or within a grade span are designated Title I (unless there is only one school) a comparability report on these schools must be done even though there are no non-Title I schools with which comparisons can be made.

In this situation, the determination of comparability should be made by comparing those schools with the highest percentage of low income children to those schools with the lowest percentage of low income children. All of those schools with the lowest percentages of low income children will be averaged for purposes of establishing the comparison ratios; however, no more than 50% of the total Title I schools should be used for this purpose.

When demonstrating compliance for comparability, an LEA may exclude State and local funds expended for—

- Language instruction educational programs;
- Excess State and local costs of providing services to children with disabilities as determined by the LEA; and
- State or local supplemental programs in any school attendance area or school that meet the intent and purposes of Title I, Part A. [NCLB, Section 1120A(c)(5) and (d); 34 Code of Federal Regulations, 200.79]

Completing Form **ED 1910-A** will determine whether a full comparability report must be made.

- 1. Comparability worksheets for schools [ED 1910-C1], certificated personnel [ED 1910-C2] and non-certificated personnel [ED 1910-C3] provide data for computational spreadsheets.
- 2. Districtwide or for each grade span and size group that has both Title I schools and non-Title I schools, Forms **ED 1910-B1** and **ED 1910-B2** must be completed.
- 3. Districtwide or for each grade span and size group in which all schools are Title I, Forms **ED 1910-B1** and **ED 1910-B2** must be completed by comparing high poverty and lower poverty schools
- 4. Assurances for Title I Comparability Form is required. [ED 1910-D]

TITLE I COMPARABILITY REPORT-[ED-1910-A] (REQUIRED)

LEA Information

- Provide the LEA name, name and signature of the director of schools, and LEA address.
- Provide the name, title, signature, telephone number, and email address of the person responsible for completing the form.
- Check appropriate response indicating original submission or revised submission.
- Check appropriate response indicating whether comparability was calculated district-wide or by grade spans.

Number of Schools by Grade Span and Size

- Record the number of schools in the LEA by grade span and size in accordance with the following instructions:
 - 1. Be sure to count all schools in the LEA **including charter schools**.
 - 2. Under "grade spans" enter the grade level groups as defined by the LEA (for ex. K-6, 7-9, 10-12). The number of grade spans should match the basic organization of schools in the LEA. If a school serves grades in more than one group, the LEA <u>shall</u> include that school in the group with which the school has the most grade levels in common **or** in the group that includes the lower grade levels, **if** the school has the same number of grade levels in common with two or more groups.
 - 3. An LEA may choose to exclude schools with enrollments of 100 or fewer students from its comparability calculations. An LEA also has the option to divide the schools in a grade span into groups of smaller and larger schools, provided the largest school is at least twice as large as the smallest. Indicate the actual range of the enrollments in one group or in the small schools and large schools groups (i.e. 107-301; 305-750).
 - 4. Record the number of Title I and non-Title I schools in each grade span and size group. If the LEA elected to skip an eligible school when allocating Title I funds because that school is receiving supplemental funds from other State or local resources that are spent according to the requirements of section 1114 or 1115 of Title I, that school must be treated as if it were a Title I school when determining comparability. In comparability calculations, exclude any supplemental State and local funds expended in such school. Total each column.
- If applicable, complete the section regarding schools with 100 or fewer students.
- Enter the data collection date. Data (student enrollment, FTE instructional staff, and number of low income students) should be from the same reporting period of the current school year.

Instructions for Comparability Reporting

• Check the appropriate box to indicate whether instructional staff paid with state supplemental BEP 2.0 funds have been included or excluded from comparability calculations. Section 200.79, Title I, 34 Code of Federal Regulations (CFR), specifies that for the purpose of determining compliance with the comparability requirement in section 1120A(c) of the ESEA, an LEA *may* exclude supplemental State and local funds spent in any school for programs that meet the intent and purposes of Title I.

A program meets the intent and purposes of Title I if the program either:

Option 1:

- i. Is implemented in a school in which the percentage of children from low-income families is at least 40 percent;
- ii. Is designed to promote schoolwide reform and upgrade the entire educational operation of the school to support students in their achievement toward meeting the State's challenging academic achievement standards that all students are expected to meet;
- iii. Is designed to meet the educational needs of all students in the school, particularly the needs of students who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards; AND
- iv. Uses the State's assessment system under section 200.2 to review the effectiveness of the program.

OR

Option 2:

- i. Serves only students who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards;
- ii. Provides supplementary services designed to meet the special educational needs of the students who are participating in the program to support their achievement toward meeting the State's student academic achievement standards; AND
- iii. Uses the State's assessment system under section 200.2 to review the effectiveness of the program.

COMPARABILITY WORKSHEET FOR SCHOOLS [ED-1910-C1]--Optional

- **School System** Enter the legal school system name.
- Name of School List by name every school in the LEA (include charter schools, if applicable).
- **Enrollment** For each school listed, record enrollment information.
- **Poverty-** For each Title I school listed, record poverty data for the same reporting period used for enrollment.
- Grade Span For each school listed, indicate by an "X" all the grades included in that school

COMPARABILITY WORKSHEET FOR CERTIFIED INSTRUCTIONAL PERSONNEL [ED-1910-C2]

One form should be completed for **each** school being compared. Duplicate this form as necessary. (A locally developed form may be used but it must clearly delineate the same information indicated by this form.)

- **System -** Record the legal school system name.
- **School** Record the complete name of the school.
- **Grade Span -** Record actual grade span of the individual school. (i.e. K-6)

• Column 1 - Name of Employee

List the names of all certified instructional personnel employed at the school, whether full or parttime at that school. (*Use payroll, time records, and/or other documented sources.*)

Column 2 - Position

For each person named in column 1, state the position in the school.

Column 3 - Federal FTE

For each person named in column 1, list his/her full time equivalent (FTE) from federal funding, if any.

If the person is paid partially from state/local funds and partially from federal funds, make the appropriate entry in each column (3 and 4).

• Column 4 – State/local FTE

For each person named in column 1, list his/her full time equivalent (FTE) from state/local funding, if any.

If the person is paid partially from state/local funds and partially from federal funds, make the appropriate entry in each column (3 and 4).

• Column 5 – Excluded (LEP/SWD/BEP 2.0)

Enter an "X" to indicate that this person is fully or partially funded by state/local funds but is excluded from comparability calculations in accordance with NCLB, Section 1120A (c)(5) or Section 200.79 of the Title I, Code of Federal Regulations (CFR).

• Enter the grand total for both the State/local FTE and the FTE excluded from the count. This data is entered at the bottom of columns 4 and 5.

COMPARABILITY WORKSHEET FOR NON-CERTIFIED INSTRUCTIONAL PERSONNEL [ED-1910-C3]

One form should be completed for **each** school being compared. Duplicate this form as necessary. (A locally developed form may be used but it must clearly delineate the same information indicated by this form.)

- **System -** Record the legal school system name.
- **School** Record the complete name of the school.
- **Grade Span -** Record actual grade span of the individual school. (i.e. K-6)

• Column 1 - Name of Employee

List the names of all certified instructional personnel employed at the school, whether full or parttime at that school. (*Use payroll, time records, and/or other documented sources.*)

• Column 2 - Position

For each person named in column 1, state the position in the school.

• Column 3 – Actual Federal FTE

For each person named in column 1, list his/her full time equivalent (FTE) from federal funding, if any.

If the person is paid partially from state/local funds and partially from federal funds, make the appropriate entry in each column (3 and 4).

• Column 4 – State/local FTE

For each person named in column 1, list his/her full time equivalent (FTE) from state/local funding, if any.

If the person is paid partially from state/local funds and partially from federal funds, make the appropriate entry in each column (3 and 4).

• Column 5 – State/local FTE for comparability

One (1.0) full time equivalent non-certified instructional position is equal to .5 full time equivalent for comparability calculations.

• Column 6 – Excluded (LEP/SWD/BEP 2.0)

Enter an "X" to indicate that this person is fully or partially funded by state/local funds but is excluded from comparability calculations in accordance with NCLB, Section 1120A (c)(5) or Section 200.79 of the Title I, Code of Federal Regulations (CFR).

NON-TITLE I SCHOOLS OR LOWER POVERTY TITLE I SCHOOLS DETAILED SCHOOL DATA [ED 1910-B1]

REQUIRED FORM FOR ALL LEAS THAT MUST DOCUMENT COMPARABILITY - Duplicate form if necessary.

- **School System** Enter the legal school system name.
- Check appropriate response to indicate how comparability is determined.

 (If grade-span comparability is used, indicate grade-span reported on this sheet.)
- Check appropriate response to indicate the group reported on this sheet: 1) small schools group, 2) large schools group or 3) all schools included in one group.
- Check appropriate response to indicate whether LEA is listing non-Title I schools or lower poverty Title I Schools.

Column 1 - Name

- List by name each non-Title I school or lower poverty Title I school in this grade span and size group.
- Indicate a skipped Title I eligible school with an "*".

Column 2 - Actual Grade Span

Enter the actual span of grades operated in each school.

Column 3- Student Enrollment (excluding Pre-K students)

Record the actual number of students enrolled in each school on the date being used for reporting.

Column 4- FTE Instructional Staff (excluding Pre-K and federally funded positions)

Determine the number of FTE instructional staff members paid with State and local funds who are regularly assigned to each school listed. Prorate time as necessary and *express the result to the nearest tenth*.

Explanation: When calculating FTE instructional staff paid by state/local funds in order to determine compliance with comparability requirements, the LEA *is not required to* but *may* exclude instructional personnel (teachers, instructional facilitators, and other instructional personnel) paid from BEP 2.0 funds if all requirements in Option 1 or 2 on page 3 are met. Consistency must be maintained.

Column 5 - Low Income Students (No Pre-K)

Complete this column **ONLY** if all schools in this grade span (and size if divided into small and large) are Title I schools.

Column 6- Poverty Percentage

Complete this column **ONLY** if all schools in this grade span (and size if divided into small and large) are Title I schools.

Total Student Enrollment- Add student enrollment figures and enter the total at the bottom of column 3.

- **Total FTE Instructional Staff-** Add FTE Instructional Staff figures and enter the total at the bottom of column 4.
- **Average Student Enrollment-** Divide the total number of students enrolled in these schools by the number of such schools. *Enter the result to the nearest student*. The electronic file will calculate this.
- **Average FTE Instructional Staff-** Divide the total number of full-time equivalent instructional staff members assigned to these schools by the number of schools. *Enter the result to the nearest tenth.* The electronic file will calculate this.
- **Box 7A** Divide the average student enrollment by the average FTE instructional staff. *Express the result to the nearest tenth*. The electronic file will calculate this.
- **Box 7B** Multiply the amount in Box 7A by 110%, and *enter the result in Box 7B to the nearest tenth*. The electronic file will calculate this.

TITLE I SCHOOLS OR HIGHER POVERTY TITLE I SCHOOLS DETAILED SCHOOL DATA [ED-1910-B2]

(REQUIRED FORM FOR ALL LEAS THAT MUST DOCUMENT COMPARABILITY)-Duplicate form if necessary.

- **School System** Enter the legal school system name.
- Check appropriate response to indicate how comparability is determined.

(If grade-span comparability is used, indicate grade-span reported on this sheet.)

- Check appropriate response to indicate the group reported on this sheet: 1) small schools group, 2) large schools group or 3) all schools included in one group.
- Check appropriate response to indicate whether LEA is listing Title I schools OR High Poverty Title I schools

Column 1 - Name

- List by name each Title I school or High Poverty Title I school in this grade span and size group.
- Indicate a skipped Title I eligible school with an "*".

Column 2 - Actual Grade Span

Enter the actual span of grades operated in each school.

Column 3- Students Enrollment (excluding Pre-K students)

Record the actual number of students enrolled in each school on the date being used for reporting.

Column 4- FTE Instructional Staff (excluding Pre-K and federally funded positions)

Determine the number of FTE instructional staff members paid with State and local funds who are regularly assigned to each school listed. Prorate time as necessary and *express the result to the nearest tenth*.

Explanation: When calculating FTE instructional staff paid by state/local funds in order to determine compliance with comparability requirements, the LEA is not required to but may exclude instructional personnel (teachers, instructional facilitators, and other instructional personnel) paid from BEP 2.0 funds if all requirements in Option 1 or 2 on page 4 are met. Consistency must be maintained.

Column 5- Student/Instructional Staff Ratio

Enter the result of dividing Column 3 by Column 4. *Express the result to the nearest tenth*, as in 19.5 students per staff member.

Column 6 - Low Income Students (No Pre-K)

Complete this column **ONLY** if all schools in this grade span (and size if divided into small and large) are Title I schools.

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Instructions for Comparability Reporting

Column 7- Poverty Percentage

Complete this column **ONLY** if all schools in this grade span (and size if divided into small and large) are Title I schools.

Column 8- Comparable (Yes or No)

Paper copy: After the figures have been calculated for the non-Title I or Title I lower percentage schools [Form ED 1910-**B1**], box 7B (bottom right of the form) will contain the number to be used for comparison with the Title I schools [Form ED-1910-**B2**]. Compare the entry in Column 5 [Form ED-1910-**B2**] for each Title I school to the figure in Box 7B [Form ED-1910-**B1**]. If the entry in Column 5 is more than the entry in Box 7B, enter "No" in Column 8 [Form ED-1910-**B2**] for that school. If the entry in Column 5 is equal to or less than the entry in Box 7B enter "Yes" in Column 8 [Form ED-1910-**B2**] for that school.

Electronic file: This column will auto fill from the data entered on the two spreadsheets.

ASSURANCES FOR TITLE I COMPARABILITY FOR SCHOOL YEAR 2008-2009 [ED-1910-D]

(REQUIRED FORM FOR ALL LEAS THAT MUST DOCUMENT COMPARABILITY)
[These assurances are found in Section 1120A.(2)(A).]

- Name of LEA Record the legal name of the LEA
- **Signature of Title I Director -** Have the Title I Director sign the assurances.
- **Date**—Enter the date the form was signed.

ALL forms and electronic copies must be submitted to the assigned consultant.

COMPARABILITY

An LEA must use State and local funds in Title I schools to provide services that, taken as a whole, are at least comparable to services in non-Title I schools; or if all schools are Title I schools, the LEA uses State and local funds to provide services that, taken as a whole, are substantially comparable in each school.

NCLB—Title I, Part A—Basic Program Requirements

SEC. 1120A. FISCAL REQUIREMENTS

- (c) COMPARABILITY OF SERVICES-
 - (1) IN GENERAL-
 - (A) COMPARABLE SERVICES- Except as provided in paragraphs (4) and (5), a local educational agency may receive funds under this part only if State and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part.
 - (B) SUBSTANTIALLY COMPARABLE SERVICES- If the local educational agency is serving all of such agency's schools under this part, such agency may receive funds under this part only if such agency will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.
 - (C) BASIS- A local educational agency may meet the requirements of subparagraphs (A) and (B) on a grade-span by grade-span basis or a school-by-school basis.
 - (2) WRITTEN ASSURANCE-
 - (A) EQUIVALENCE- A local educational agency shall be considered to have met the requirements of paragraph (1) if such agency has filed with the State educational agency a written assurance that such agency has established and implemented--
 - (i) a local educational agency-wide salary schedule;
 - (ii) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and
 - (iii) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.
 - (B) DETERMINATIONS- For the purpose of this subsection, in the determination of expenditures per pupil from State and local funds, or instructional salaries per pupil from State and local funds, staff salary differentials for years of employment shall not be included in such determinations.
 - (C) EXCLUSIONS- A local educational agency need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services under this subsection.
 - (3) PROCEDURES AND RECORDS- Each local educational agency assisted under this part shall--
 - (A) develop procedures for compliance with this subsection; and
 - (B) maintain records that are updated biennially documenting such agency's compliance with this subsection.
 - (4) INAPPLICABILITY- This subsection shall not apply to a local educational agency that does not have more than one building for each grade span.
 - (5) COMPLIANCE- For the purpose of determining compliance with paragraph (1), a local educational agency may exclude State and local funds expended for-- α
 - (A) language instruction educational programs; and
 - (B) the excess costs of providing services to children with disabilities as determined by the local educational agency.
- (d) EXCLUSION OF FUNDS- For the purpose of complying with subsections (b) and (c), a State educational agency or local educational agency may exclude supplemental State or local funds expended in any school attendance area or school for programs that meet the intent and purposes of this part.

Date Received by Consultant

TITLE I COMPARABILITY REPORT

GENERAL INFORMATION (Submit electronic file and original to NCLB consultant)

	GENERAL	INTORMA	110N (Subilit electro			•					
LEA				Name of R	esponsible Offi	icial					
Director of Sch	ools' Name			Title							
			Signature								
Mailing Addres	SS			Telephone							
			Email								
NOT D.C. II	49 69										
NCLB Consulta	ant's Signature			Date review	ved by consulta	int					
	s an original subm			1 . 14. 1	14.4.5						
Check appropr		iowing realloc	cation of resources and i	s submitted n	o later than Do	ecember 1.					
☐ This local ed	lucation agency ha ity was calculated	s only one bui	ilding for each grade spa vide basis	an. (Complet	e grade span c	hart; remainder of repor	t is inapplica	ıble.)			
Comparabil	ity was calculated	on a grade sp	an basis. (Must match			nools in the LEA. See dir	ections.)				
G 1. G	T	NUMBE	R OF SCHOOLS B	SY GRADE	E SPAN ANI	_	C C -11-				
Grade Span	Record enro	llment of sma	Enrollment Range llest & largest school in	appropriate o	category(s)	Number of Title I	Non-Ti	itle I			
	One group										
	Small Schools										
	Large Schools										
	One group										
	Small Schools										
	Large Schools										
	One group										
	Small Schools										
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	One group										
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	One group										
	Small Schools										
	Large Schools										
					Totals						
~ -		T	Schools with 100			~					
Schoo	l Name	#Enrolled	School Nar	ne	#Enrolled	School Name	#E	Enrolled			
	Date of data collection (student enrollment, FTE instructional staff, and number of low income students): Check appropriate response:										
LEA receive	es no BEP 2.0 fund al staff paid with st	tate suppleme	ntal BEP 2.0 funds have			oility calculations.	raquiramant	·e			
			ital BEP 2.0 lungs nave				requirement	o ee:			

Title I Schools or Higher Poverty Title I Schools Detailed School Data-Title I Comparability Report (Submit electronic file to NCLB consultant) School System: If Grade Span, specify: Small Schools Large Schools Check appropriate response: All Schools in district Grade span One Group **Check Appropriate Response:** 2 6 8 Check appropriate response: Actual Student Enrollment FTE Instructional Staff-Student/Instructional Low Income **Poverty Percentage** Comparable Grade (Do not include **Local and State Funds** Staff Ratio Students (Low income (Yes or no) ■ Title I Schools (No Pre-K) students divided by Span Pre-K) (Enrollment (No Pre-K) O High Poverty Title I Schools Use whole Express to divided by FTE Staff)enrollment) (indicate with* a skipped Title I eligible school) numbers nearest tenth to nearest tenth School Name 3 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30

Non-Title I Schools or Lower Poverty Title I Schools Detailed School Data-Title I Comparability (Submit electronic file to NCLB consultant) School System:

School System:	_1		_	One Group Sn	
Check appropriate response:	If Grade Spa	an, specify:	Check Appropriate Response:	nall Schools	
1	2	3	4	5	6
Check appropriate response:	Actual	Student Enrollment	FTE Instructional Staff-	Low Income	Poverty Percentage
Non-Title I Schools	Grade	(Do not include	Local and State Funds	Students	(Low income
Low Poverty Title Schools(indicate with * a skipped Title eligible asked)	Span	Pre-K)	(No Pre-K)	(No Pre-K)	students divided by
school)		Use whole	Express to		enrollment)
School Name		numbers	nearest tenth		
1					
2					
3					
4					
5					
6					
7					
9	-				
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22 23					
24					
25					
26					
27					
28					
29					
30					
31					
32				<u> </u>	
	Total	0	0.0		
	Average				
		7A			7B
Average student/instructional staff ratio for non-Title I schools(or low pov	erty title I		110% of average student/instru	uctional staff ratio for non-	
schools) in this grade span and size grouping)-divide average student en	rollment by		title I schools (or low poverty T		
Average FTE instructional staff. Express result to nearest tenth.			span and size grouping)-Expre	ss result to nearest tenth.	

COMPARABILITY WORKSHEET FOR SCHOOLS—Optional

System	_

			Grade Span												
Name of School	Enrollment	Poverty	K	1	2	3	4	5	6	7	8	9	10	11	12
1.															
2.															
3.															
4.															
5.															
6.															
7.															
8.															
9.															
10.															
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12.															
13.															
14.															
15.															
16.															
17.															
18.															
19.															
20.															

${\bf COMPARABILITY\ WORKSHEET\ FOR\ CERTIFIED\ INSTRUCTIONAL\ PERSONNEL}$

(Submit data to NCLB Consultant)

System	School	Grade Span

Include teachers, principal, instructional facilitators, librarians, guidance, and psychological personnel assigned to this school. Exclude pre-school teachers. See NCLB, Section 1120A for other possible exclusions.

L	1	2	4	5	
	Name of Employee	Position	Federal FTE	State/local FTE	Excluded (LEP/ SWD/ BEP 2.0)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					
35					
36					
37					
38					
39					
40					
		•	Totals	0	(

COMPARABILITY WORKSHEET FOR NON-CERTIFIED INSTRUCTIONAL PERSONNEL

(Submit data to NCLB Consultant)

System		School		Grade Span		
Include in		other paraprofessionals who assist instructional staff assistional support, and pre-K staff. See NCLB, Section 112			service, other person	nel not providing
I	1	2	3	4	5	6
	Name of Employee	Position	Actual Federal FTE	Actual State/Local FTE	State/Local FTE for comparability (1 FTE=.5	Excluded (LEP/SWD/ BEP 2.0)
1						
2						
3						
4						
5						
6						
7						
8						
9						
0						
1						
2						
3						
5						
6						
7						
8						
9						
20						
:1						
2						
23						
24						
25						
:6						
27						
.8						
.9						
0						
51						
2						
3						
54						
15						
36						
57						
8						
.0						
<u> </u>		<u> </u>	ļ	Totals	0	0